REMARKS

Claims 1-20 are pending.
Claims 1-20 are rejected.
Claims 21-23 are cancelled.

Claim 1 is amended to eliminate the claim elements pertaining to a "file structure" and a "different file structure". Claim 1 is also amended to link up the elements of a data conversion from a volume structure to a different volume structure and/or converting navigation data to different navigation data compliant with a second data format.

Claims 2 and 3 are amended to change the term "derived parameters" to "determined parameters", as requested by the Examiner in the Office Action.

Claims 4 and 17 are amended to eliminate "audio data" from the claims.

Claim 11 is amended to state that the method for converting changes data corresponding to a digital disc format to data corresponding to a second digital disc format. Support for this amendment is found in the specification on page 3, line 37 to page 4, line 24, page 5, lines 16-24, and in other places.

Claim 13 is amended to change the dependency of the claim from Claim 6 to Claim 11.

Claim 14 is amended to state the method is for converting changes data of a digital disc format to a data of a second digital disc format. Support for this amendment is found in the specification on page 3, line 37 to page 4, line 24, page 5, lines 16-24, and in other places.

No new matter was added in view of these amendments.

I. 35 U.S.C. § 102 Rejection of Claims 1-12 and 14-20

The Examiner rejected Claims 1-12 and 14-20 under 35 U.S.C. 102(b) as being anticipated by to Horiguchi et al, (U.S. Patent # 6,370,322, hereafter referred to as 'Horiguchi'). Applicants disagree with this ground of rejection.

Claim 1 as amended claims an operation of performing a data conversion where "a volume structure" is converted into a "second volume structure" and/or "navigation data" is converted into "different navigation data comprising a pre-formatted navigation data field compliant with [a] second data format". This type of data conversion is neither disclosed nor suggested in Horiguchi.

Specifically, Horiguchi is directed towards a conversion of data from a DVD player for playback on a display device such as a digital television. The invention operates by taking the data from the DVD and multiplexes such data into a data format that is capable of being transmitted over an IEEE 1394. The television that received the data over the IEEE 1394 bus then uses demultiplexer to create data corresponding to audio, video and navigation data. The television set then uses the received navigation data to control the DVD player for the receipt of subsequent audio and video data.

In such, the operations described in Horiguchi do not require or perform the claimed steps of Claim 1. Specifically, the operations described in the reference are towards the control of a DVD player via an IEEE 1394 bus, where the controlling device (the television) has an audio decoder 53, video decoder 54, and a decoder 56 possessing a PCI decoder and a DSI decoder. The decoder 56 then "decodes the input PCI of NV_PCK and DSI respectively" (Horiguchi, col. 4, lines 47-51). In such, there is no disclosure or suggestion that the NV_PCK or the DSI information (or any other navigation information) is any different than such information found on a DVD (as in Fig. 3).

Specifically, there is no data conversion in Horiguchi where either a volume structure is converted to a second volume structure or where navigation data is "converted" into different navigation data comprising said pre-format navigation data field, as in claimed in Claim 1. The structure of Horiguchi is in essence a multiplexing and demultiplexing operation where the data format of the volume and navigation data is preserved. The novelty to the invention is putting the data into a format that can be multiplexed over an IEEE 1394 as an MPEG transport stream. The television set receiving the multiplexed data needs to utilize the same type of volume or navigation data as the DVD player because the television set is actually controlling the operation of the DVD player (in real or near to real time) in order to receive video, audio, and navigation data.

Claim 4 claims that the different programs comprise Internet web page data, text data, and/or program guide data. None of these claimed elements are either disclosed or described in Horiguchi.

Claim 11 claims an operation of converting digital video data corresponding to a digital disc format to a data format corresponding to a second digital disc format. Nothing in Horiguchi discloses or suggests such a type of operation. Specifically, Horiguchi is directed towards an operation of having a digital television control the operation of a DVD player. The DVD player, in order to accommodate this operation, multiplexes data over an IEEE 1394 to the television set which then demultiplexes such received information.

In such, the operation of the DVD player with the television set does not disclose or suggest the need to convert from a digital disc format to a second disc format. This type of operation, as claimed in Claim 11, would also be counterproductive for the operation of the television of Horiguchi because the disclosed method provides a way for remotely controlling a DVD player, without having to have a DVD at the location of the digital television.

Claim 14 claims an operation of converting digital video data of first digital disc format to a second data format a second digital disc format. Nothing in Horiguchi discloses or suggests such a type of operation. Specifically, Horiguchi is directed towards an operation of having a digital television control the operation of a DVD player. The DVD player, in order to accommodate this operation, multiplexes data over an IEEE 1394 to the television set which then demultiplexes such received information.

In such, the operation of the DVD player with the television set does not disclose or suggest the need to convert from a digital disc format to a second disc format. This type of operation, as claimed in Claim 14, would also be counterproductive for the operation of the television of Horiguchi because the disclosed method provides a way for remotely controlling a DVD player, without having to have a DVD at the location of the digital television.

Claim 17 claims that the different programs comprise Internet web page data, text data, and/or program guide data. None of these claimed elements are either disclosed or described in Horiguchi.

For the reasons given above for Claims 1, 4, 11, 14, and 17, Applicants assert that such claims are patentable over Horiguchi. Applicants request that the Examiner remove the grounds of rejection to these claims. In addition, Claims 2-3, 5-9, Claims 12-13, and Claims 15-16, and 18-20, are patentable, as such claims depend on Claims 1, 11, and 14, respectively. Applicants request that the Examiner grounds of rejection to these claims, as well.

II. 35 U.S.C. § 103 Rejection of Claim 13

The Examiner rejected Claim 13 under 35 U.S.C. 103(a) as being anticipated by Horiguchi in further view of Maruyama et al. (U.S. Patent # 6,385,389, hereafter referred to as 'Maruyama'. Applicants disagree with this ground of rejection.

Claim 13 claims that the first data format comprises a read only format and the second data format comprise a different recordable data format. These claimed features, when combined with newly amended Claim 11, the first data format would be associated with a digital disc format, and the second data format would associated with a second digital disc format.

As explained above, the usage of two different disc formats for Horiguchi would frustrate the operation of the reference. This point is the case when Horiguchi is combined with Maruyama because the invention for Horiguchi is for operating a DVD player remotely through an IEEE 1394, where the operation of the invention controls the DVD player through the bus. There is no need or suggestion that Horiguchi should be combined with Maruyama. That is, Horiguchi operates without the need to supply a storage device at the site of the DVD (as suggested by the Examiner's combination of Horiguchi with Maruyama) because the storage device being controlled is remote from the television. To add a storage device at the site of the digital television would obviate the need to remotely control a DVD player.

Moreover, there is a technical problem with the Examiner's cited combination. The operation of Horiguchi and Maruyama allows a user to remotely control a DVD player, where navigational data is used to operate a DVD in a non-linear fashion (such as using trick play, skipping scenes etc.). A storage device (as disclosed by Maruyama with Horiguchi) would not make any sense
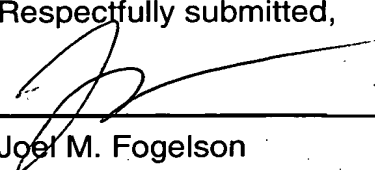
because the storage device would have no way of capturing accurately (and reproducing) the non-linear format of a DVD because the stream being stored would be the stream that is being decoded by the television set in real time. Alternatively, if all of the DVD information were available at the site of the television set (after performing a recording operation somehow), there would be no reason to remotely control a DVD as disclosed in Horiguchi in combination with Maruyama. Therefore, in either case, there is no need to combine Horiguchi with Maruyama, as suggested by the Examiner.

For the reasons given above, Applicants assert that Claim 13 is patentable.

Applicants request a three-month extension from the December 22, 2005 date for which this response was originally due. Please charge the fee for this extension, and any other fees owned in connection with this action to Deposit Account 07-0832.

Having fully addressed the Examiner's rejections it is believed that, in view of the preceding amendments and remarks, this application is in condition for allowance. Accordingly, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact the Applicants' attorney at (609) 734-6809, so that a mutually convenient date and time for a telephonic interview may be scheduled.

Respectfully submitted,

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March 22, 2006